

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**ALTPASS LLC,**

Plaintiff,

v.

**KYOCERA INTERNATIONAL, INC.,**

Defendant.

**Civil Action No. 2:20-cv-0125-JRG**

**JURY TRIAL DEMANDED**

**AGREED MOTION TO STAY ALL PENDING DEADLINES  
AND NOTICE OF SETTLEMENT**

Plaintiff, Altpass LLC (“Plaintiff”) respectfully moves this Court to stay all deadlines in the in the above-entitled and numbered action to complete settlement negotiations. Plaintiff and Kyocera International, Inc., (“Defendant”) (collectively as the “Parties”) have reached an agreement that resolves all claims asserted between them in this case. The Parties expect to jointly file a dismissal with prejudice of all claims between them within 30 days. Accordingly, Plaintiff respectfully requests that the Court stay all deadlines in the present action for 30 days, up to and including August 12, 2020. This motion is not brought for any reasons of delay, but so that the Parties may finalize the settlement agreement and file dismissal papers without incurring additional expenses. Defendant has agreed to the filing of this motion and accompanying proposed order.

DATED July 13, 2020.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF  
ALTPASS LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of July, 2020, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Neal Massand  
Neal G. Massand